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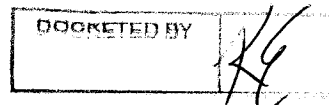
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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS 2015 OCT 26 PM 3 50

Arizona Corporation Commission

DOCKETED

OCT 26 2015



SUSAN BITTER SMITH, Chairman  
BOB STUMP  
BOB BURNS  
DOUG LITTLE  
TOM FORESE

IN THE MATTER OF THE APPLICATION OF  
GRAHAM COUNTY ELECTRIC COOPERATIVE,  
INC. TO AMEND ITS CERTIFICATE OF  
CONVENIENCE AND NECESSITY AND TO  
TRANSFER CERTAIN OF ITS ASSETS TO THE  
CITY OF SAFFORD

Docket No. E-01749A-09-0185

**GRAHAM COUNTY ELECTRIC  
COOPERATIVE NOTICE OF  
FILING SUPPLEMENTAL  
EXHIBITS**

Graham County Electric Cooperative, Inc. ("GCEC") hereby supplements the direct  
testimony of Kirk Gray with the following attached exhibits:

Exhibit KG-4: Comparison of GCEC's and the City of Safford's  
respective rates and terms of service; and

Exhibit KG-5: Statement regarding customer confidentiality from the City  
of Safford.

RESPECTFULLY SUBMITTED this 26th day of October, 2015.

GALLAGHER & KENNEDY, P.A.

By

Jennifer A. Cranston  
2575 East Camelback Road  
Phoenix, Arizona 85016-9225  
Attorneys for Graham County Electric  
Cooperative, Inc.

1 **Original and 13 copies** filed this  
26th day of October, 2015, with:

2 Docket Control  
3 Arizona Corporation Commission  
1200 West Washington Street  
4 Phoenix, Arizona 85007

5 **Copies** of the foregoing delivered this  
26th day of October, 2015, to:

6 Jane Rodda, Administrative Law Judge  
7 Hearing Division  
Arizona Corporation Commission  
8 1200 West Washington Street  
Phoenix, Arizona 85007

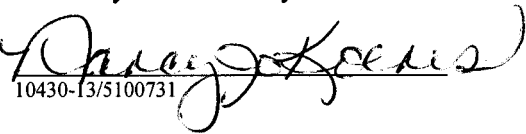
9 Maureen Scott  
10 Legal Division  
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15 Margaret (Toby) Little  
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18 **Copy** of the foregoing e-mailed  
19 this 26th day of October, 2015, to:

20 Jeffrey C. Zimmerman  
Moyes, Sellers & Hendricks  
21 1850 North Central Avenue, Suite 1100  
Phoenix, Arizona 85004  
22 Attorneys for the City of Safford

23   
10430-13/5100731

**EXHIBIT KG-4**

**Graham County Electric Cooperative, Inc.**  
**ACC Docket No. E-01749A-09-0185**  
**Comparison of Rates and Terms of Service**

Pursuant to Decision No. 70289 in Docket No. E-01749A-07-0236, Graham County Electric Cooperative, Inc. ("GCEC") currently has in place the following relevant<sup>1</sup> tariffs:

- Rate Schedule A, Residential Service
- Rate Schedule B, General Service & Small Commercial
- Rate Schedule C, Large Commercial and Gins
- Rate Schedule I, Irrigation Service
- Rate Schedule SCL, Security Lighting
- Rate Schedule SC, Service Charges
- Schedule EM, Estimation Methodologies
- Schedule NM, Net Metering Tariff<sup>2</sup>

The City of Safford ("Safford") has in place the following relevant tariffs:

- Rate Schedule ER, Residential Service
- Rate Schedule EC, General Commercial Service
- Rate Schedule ECLD, Large Commercial Service
- Adjustment Schedule PPA, Purchased Power Adjustment

The chart below compares GCEC's and Safford's rates and charges:

	GCEC	Safford
Residential monthly minimum charge	\$9.00	\$9.00
Residential commodity charge per kWh	\$0.11038	\$0.0935
Small Commercial monthly minimum charge	\$15.00	\$12.00
Small Commercial commodity charge per kWh	\$0.10969	\$0.1000
Large Commercial monthly minimum charge	\$50.00	\$50.00
Large Commercial commodity charge per kWh	\$0.09876	\$0.0660

<sup>1</sup> GCEC also has certain tariffs in place that are not relevant to this proceeding because (1) they do not apply to the GCEC customers currently located in the Safford Service Area and/or (2) the City of Safford does not have a comparable schedule or program. Those GCEC tariffs include Rate Schedule OIR (Optional Interruptible Rate For Irrigation Pumps 50 HP or Greater), Rate Schedule SL (Street Lighting), Rate Schedule CP (Contract Power Service), Schedule QF (Co-Generation Qualifying Facilities and Small Power Production Facilities Under 100 kW), Schedule Cogen (Optional Electric Service For Qualified Cogeneration And Small Power Production Facilities Over 100 kW), Schedule A-DSM (Demand Side Management Adjustment), Renewable Energy Standard Tariff and Experimental Schedule A-TOU (Residential Time of Use Service).

<sup>2</sup> GCEC's current net metering tariff was approved in Decision No. 74874 in Docket No. E-01749A-14-0257.

Irrigation Service monthly minimum charge	\$23.00	\$12.00
Irrigation Service commodity charge per kWh	\$0.11554	\$0.1000
Security Lighting monthly minimum charge (small)	\$5.77	\$8.00 (residential) \$12.00 (commercial) \$8.00 (government)
Security Lighting monthly minimum charge (large)	\$7.06	N/A
Security Lighting commodity charge per kWh	\$0.07651	\$0.1000 (commercial)
New or Additional Service Connection charge	\$10.00	\$25.00
Service Connection Callbacks	\$10.00	N/A
Service Calls after Regular Business hours	\$50.00	\$35.00
Disconnects	\$10.00	N/A
Reconnects during Regular Business hours	\$10.00	N/A
Reconnects after Regular Business hours	\$30.00	\$35.00
Returned Check Fee	\$25.00	\$27.50 (check) \$35.00 (electronic payment)
Late Payment Charge	1.5%	5% (after first warning)  Greater of \$10.00 or 5% (for repeat occurrences)
Meter Test	\$10.00	N/A
Meter Rereads (if original not in error)	\$10.00	N/A
Purchased Power Adjustment	(\$0.005) <sup>3</sup>	\$0.024

In addition to the above-referenced rates and charges, GCEC and Safford have in place the following relevant terms of service policies:

**Meter Readings:**

- GCEC's meter readings and billings are based on actual meter readings, which readings are made as close as practical on the same day of each month on a cycle basis. However, in the event that a valid meter reading cannot be acquired, GCEC applies the estimation procedures set forth in its Schedule EM.
- Safford's meter reading and billing practices are set forth in Municipal Code § 13.04.150. Bills are based on actual meter readings except when specified otherwise in the city code. Meter readings are made as closely as practical on the same day of each month. Meters shall be readily accessible to the meter reader. The customer shall maintain said access in such manner that will not be hazardous or difficult to the meter reader. If access does not

<sup>3</sup> Per GCEC's PPA filing in Docket No. E-01749A-07-0236 on September 10, 2014.

comply with the above, billing may be averaged until such time as satisfactory access is restored. Also, pursuant to § 13.04.080, if a meter is found to be not registering or registering incorrectly, the charge for that utility service, for the period then ending, shall equal the charge for the same service for a like period.

**Terms of Payment:**

- GCEC's bills for electric service are due and payable no later than fifteen (15) days from the billing date. Bills become delinquent (and subject to a late payment charge) twenty-five (25) days from the billing date and are subject to disconnect upon five (5) days written notice.
- Pursuant to Safford's Municipal Code § 13.04.160, all charges for utility service shall be due and payable on the first day of the month and shall be deemed delinquent after the twentieth day of the calendar month. Section 13.04.200 provides that, if the charges for utility service for any month, or partial month, be not fully paid before the close of the business day of the twenty-fifth day of the month following the period for which such charges are incurred, the utility service shall be discontinued.

**Line Extensions:**

- Pursuant to GCEC's line extension tariff, upon request, GCEC shall prepare, without charge, a preliminary sketch and rough estimate of cost of installation to be paid by the applicant. If the applicant requests detailed plans, specifications or costs estimates, a deposit may be required. The details of a line extension agreement shall be set forth in a written agreement, which shall include payment terms and refunding provisions, if applicable. No footage or equipment allowance are provided by GCEC at no charge.
- Safford requires the applicant to provide engineered electrical plans to the Planning and Community Services department. After approval, Safford provides to the applicant an estimate for material and labor without charge. A line extension is typically approved through a plan review process, and any refund arrangements are memorialized in a development agreement.

**Net Metering:**

- Under GCEC's net metering tariff, if the electricity generated by the customer's net metering facilities and delivered back to GCEC exceeds the electric kWh energy supplied in the billing period, the excess kWh is credited to reduce the kWh supplied and billed during subsequent billing periods. Once each calendar year, GCEC issues a check or billing credit for the balance of any credit due.
- Safford adopted a net metering policy in 2010 pursuant to which a customer's net excess generation is carried over to the customer's next bill as a kWh credit. Any credit balance remaining at the end of the calendar year is not carried forward or otherwise credited to the customer's account.

**EXHIBIT KG-5**



## City of Safford

### Confidentiality Policy

"The City of Safford has the following practice concerning the disclosure of customer-specific information to third parties. Customer-specific information, such as that collected and used by the City of Safford for the determination of credit rating and security deposit at the time of new service connection, is not released without specific prior written customer authorization unless the information is requested by a law enforcement agency, is required for legitimate account collection activities, or is necessary to provide safe and reliable service to the customer. In addition, the City of Safford has a formal policy concerning the prevention and identification of identity theft with respect to its customers."

A handwritten signature in black ink, which appears to read "Horatio Skeete", is written over a horizontal line.

Horatio Skeete, City Manager